

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ROCK HILL DIVISION

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

NATIONAL LANDMARK LOGISTICS LLC,
et al.,

Defendants

Civil Action No. 0:20-cv-02592-JMC

**JOINT MOTION TO ENTER
STIPULATED ORDER FOR
PERMANENT INJUNCTION AND
MONETARY JUDGMENT AS TO
NATIONAL LANDMARK
DEFENDANTS**

Plaintiff, the Federal Trade Commission (“FTC”), commenced this civil action on July 13, 2020, pursuant to Sections 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 53(b) and 57b, and Section 814(a) of the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692l(a). (ECF No. 2.)

On July 17, 2020, on motion by the FTC, the Court entered an *ex parte* temporary restraining order (“TRO”) with asset freeze and other equitable relief against Defendants. (ECF No. 21.) On August 14, 2020, the Court extended the TRO for thirty days. (ECF No. 53.) On October 8, 2020, the Court entered a preliminary injunction as to the National Landmark Defendants. (ECF No. 65.)

Now, the FTC, the National Landmark Defendants, and the Receiver, by and through their undersigned counsel, have stipulated and agreed to entry of the attached Stipulated Order for Permanent Injunction and Monetary Judgment (“Order”) to resolve all matters in dispute in this action between them. The Receiver is entering into this Order on behalf of Silverlake Landmark Recovery Group, LLC based upon the powers granted to her pursuant to the Stipulated Preliminary Injunction as to the National Landmark Defendants entered by the Court on October 8, 2020 (ECF No. 65).

Accordingly, the parties respectfully request the Court to enter the attached Order.

IT IS SO STIPULATED:

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*Attorneys for the Court-appointed Receiver
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 30, 2021, a true and correct copy of
**(1) JOINT MOTION TO ENTER STIPULATED ORDER FOR PERMANENT
INJUNCTION AND MONETARY JUDGMENT AS TO NATIONAL LANDMARK
DEFENDANTS** and **(2) [proposed] STIPULATED ORDER FOR PERMANENT
INJUNCTION AND MONETARY JUDGMENT AS TO NATIONAL LANDMARK
DEFENDANTS** were filed electronically with the United States District Court for the District of
South Carolina using the CM/ECF system, which sent notification to all parties of interest
participating in the CM/ECF system.

/s/Johanna C. Valenzuela
Attorney for Plaintiff Federal Trade Commission